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Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Plaintiff,

v.

DOT FOODS, INC.,

Defendant.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02045 (PRW)

FOURTH STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant, Dot Foods, Inc. (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on February 23, 2022, the Parties entered into a stipulation (the “First Stipulation”) by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered February 24, 2022.

WHEREAS, on April 11, 2022, the parties entered into a stipulation (the “Second Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including June 15, 2022. The Second Stipulation was approved by order entered April 12, 2022.

WHEREAS, on June 2, 2022, the parties entered into a stipulation (the “Third Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including July 15, 2022. The Third Stipulation was approved by order entered June 3, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including August 11, 2022.

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2. All other terms set forth in the First Stipulation, Second Stipulation, and Third Stipulation remain in full force and effect.

Dated: July 18, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

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Counsel to Plaintiff RDC Liquidating Trust

Dated: July 12, 2022

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Counsel to Defendant Dot Foods, Inc.

SO ORDERED:

DATED: _____, 2022

Rochester, New York

HON. PAUL R. WARREN

United States Bankruptcy Judge